

EXHIBIT G

Exhibit G(I), Motion to Try Petition on Hearing Record

Amazon.com Services LLC
Case 29-CA-261755

Confidential Witness Affidavit

I, Gerald Bryson, under the penalty of perjury, state as follows:

I have been given assurances by an agent of the National Labor Relations Board (NLRB) that this Confidential Witness Affidavit will be considered a confidential law enforcement record by the NLRB and will not be disclosed unless it becomes necessary to produce this Confidential Witness Affidavit in connection with a formal proceeding.

I reside at [REDACTED]

My home telephone number (including area code) is [REDACTED]

My cell phone number (including area code) is [REDACTED]

My e-mail address is [REDACTED]

I was employed by Amazon.com Services LLC

located at 546 Gulf Avenue, Staten Island, NY

1. I worked at Amazon.com Services LLC, the Employer or Amazon, from about October 14, 2018, until about April 18, 2020. I worked in the outbound ship dock in JFK8 at the time of my termination. Prior to that, I worked at Pick Count Floor in JFK8. I was terminated on or about April 18, 2020. I have filed a charge in Case No. 29-CA-261755 with the NLRB over my termination which I feel was unjust. That case is currently pending.
2. In or around April 2021, myself, Chris Smalls, Derrick Palmer, and Jordan Flowers decided to start a union at Amazon. We decided to set up some tables by the S40 bus stop located on 5th Street. (Later on, we also set up tents to cover the tables.) From those

Privacy Act Statement

The NLRB is asking you for the information on this form on the authority of the National Labor Relations Act (NLRA), 29 U.S.C. § 151 et seq. The principal use of the information is to assist the NLRB in processing representation and/or unfair labor practice cases and related proceedings or litigation. The routine uses for the information are fully set forth in the Federal Register, 71 Fed. Reg. 74942-43 (Dec. 13, 2006). Additional information about these uses is available at the NLRB website, www.nlrb.gov. Providing this information to the NLRB is voluntary. However, if you do not provide the information, the NLRB may refuse to continue processing an unfair labor practice or representation case, or may issue you a subpoena and seek enforcement of the subpoena in federal court.

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- tables, we were passing out literature, talking to workers, and also having the workers sign authorization cards. At this point, I had already been terminated for about one year.
3. When the campaign first started, we were all present at the ALU tables every day, about 6-7 days per week. We would start early morning at about 8 am and we would stay until about 6:45 pm- 7 pm. While I primarily organized at the ALU tent at the S40 bus stop on 5th Street, I also tried to organize at different bus stops along the S40 bus route and I even tried organizing at the ferry terminal but realized it was best to stay at 5th Street.
 4. I was able to stay at the ALU tent 6-7 days per week until about September 2021, when the school year started. After school started, I started to come to the ALU tent about 3 times per week. I would come between about 3-5 pm and then I would leave at about 7 pm, however there were some nights where we would stay until midnight and sometimes we would even stay overnight. For these “overnights” we had a second tent which we set up on the same road, 5th Street, but a little bit further down from the S40 stop. We did about five or six overnights in total during the campaign. I started to go to the ALU tent more frequently as of last week. However, we are no longer getting cards signed because the election has already been scheduled. Now we are just organizing (handing out literature and talking to workers).
 5. I have had many conversations with people about my termination. However, I cannot recall the dates of these conversations or the names of the workers they were with since all workers’ badges have abbreviations for their names and it’s hard to see what their name actually is. (For example, my badge said “gbbryso”) However, I do recall that from the start of the ALU campaign, many workers asked me about when I was coming back

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to work. Since I had worked at the facility since 2018, and since I was very popular, many people knew me and knew what happened to me.

6. Over the course of the campaign, I have had conversations and sometimes arguments with “smart aleck” people who told me things like “you are so smart, talking about a union that is probably not gonna be and you have no job, without a determination on your case.” I do not recall these workers names who told me this. I would respond to these workers by saying, yes I don’t have a determination on my case but I must have something because the case would have been dismissed already. There was a guy who I didn’t really know, but I remember he was straight out of jail. He came to the tent and when I told him who I was, he said “look at the result you got.” I have had these types of conversations and arguments with workers more than ten times over the course of the Union campaign. Sometimes these conversations led to the worker signing the authorization card anyway and sometimes it did not. I do not recall how many did not sign.
7. I recall that many workers have asked Chris Smalls and me together what happened to us? Are you guys working? We then try to talk to them about the Union and people have said things like, “That ain’t gonna work, Amazon will not have that. Just like they have you sitting there with no work.” I would respond to these comments by saying things like, “yes look at us, we are still fighting. You know what, I don’t know the outcome, but I am here helping you.” Chris and I had these conversations with workers about five times over the course of the organizing campaign. We sometimes thought that these workers were sent over to us by Amazon.

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8. I still know a lot of the old timers (long term employees) at JFK8. A few days ago, I saw my old trainer and a few other ladies I had worked with. We had a nice reunion. The ladies had a new person with them and she asked me "am I going to end up fired like you?" (She got nervous because she saw that we had a film crew filing a documentary about us and she was afraid to be seen on the video.) I said to her no, the Union is here, no one can get fired for being with us. I don't know whether she ever signed a card. We are no longer collecting cards since an election has already been scheduled. Now we are just organizing.
9. I recall that there have been a few workers that only halfway filled out the authorization cards. I would not realize until they left that they did not fill it out completely. Most of the time I eventually got them to fill out the card, but I had to convince them that they would be safe and not lose their job if they signed. I don't recall these workers' names.
10. I know a lot of people at JFK8 so I did get a lot of signatures. When I was coming 3 days a week to organize, I would get around 5 signatures a day. When I was there 6 days a week, I would average 10-12 signatures each day. That stayed pretty consistent.
11. We are currently not collecting signatures anymore. We are out there organizing now. I am well respected by most workers but some "smart alecks" still challenge me and will say things like "what's happening with your case," "Is it over yet?," "What is up with you, did they settle?," "You working yet?" I have had workers say things like that to me at least a couple times a month. I just tell them that we are still fighting.
12. I was one of the more noticeable people in Amazon when I worked there since I was outspoken and since I was generally popular. I took a stand on the pandemic and I was fired because of it. I think this definitely had an effect on the workers. The ladies I spoke

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to last night in fact said were very skeptical about the Union because I am still not back at work. They kept asking "What happened to you?" However, I recall that I was able to get a lot of people to sign cards even though they feel like the Union isn't going to work because of Amazon's retaliation.

13. I do think that the Union will win this election, though it might be close because of Amazon's attacks on us and our organizing. A lot of people are tired of Amazon and their ways, even people who are skeptical of the Union. People who know me want to believe in me. When I worked at Amazon, I was a strong leader so I think people have faith in me. I do believe that if I was reinstated, we would definitely win.

14. I think a lot of workers also know me and know what happened to me because of how often I have been in the press over the last two years. I have been featured in articles, quoted in articles, and my picture has been taken repeatedly by members of the press throughout the campaign. In many of the biggest news articles about the Union, including those in the New York Times, my photograph appears at the top of the article. I feel like many people know that I am one of the leaders of the Union because of this, and that makes it harder to organize because they also know I was fired for my organizing work.

I understand that this affidavit is a confidential law enforcement record and should not be shown to any person other than my attorney or other person representing me in this proceeding.

I have read this Confidential Witness Affidavit consisting of X pages, including this page. I fully understand the Affidavit and I state under penalty of perjury that it is true and correct.

Date: Feb 25, 2022

Signature: Gerald Bryson
Gerald Bryson (Feb 25, 2022 16:52 EST)
Gerald Bryson

GB
 Initials: GB

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This affidavit was taken by:

Emily A. Cabrera

Emily A Cabrera

Board Agent

National Labor Relations Board

Exhibit G(1), Motion to Try Petition on Hearing Record






2022.02.25_Bryson 10j Affidavit

Final Audit Report

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